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Office of Pesticide Programs  
U.S. Environmental Protection Agency  
One Potomac Yard  
2777 South Crystal Drive, Room S4900  
Arlington, VA 22202-4501

Attention: Emily Schmid, Acting Team Leader 25

Subject: **Amendment to Roundup Weed & Grass Killer Concentrate Plus,  
EPA Reg. No. 71995-29**

Dear Emily Schmid:

As you may be aware, Bayer has acquired Monsanto Company, and consequently the Bayer brand is now the corporate brand for the combined company. I would like to take this opportunity to confirm that the legal entity Monsanto Company Lawn & Garden Products still exists with the same name and continues to be responsible for maintaining compliance with all relevant statutory, regulatory, and permit requirements, including this agency submission. If any changes to the Monsanto legal entity structure occur that affect our relationship with EPA, we will reach out to you at that time.

The current Master Label for EPA Registration 71995-29 was accepted via amendment by the Agency on March 4, 2014. Monsanto Company Lawn & Garden Products would like to amend this Master Label by incorporating a consistent format corresponding to our final printed labels, which will increase labeling accuracy and ease of review. Additionally, revisions were made to the label for uniformity across the concentrate products.

Please note for efficiency of the review, this master label amendment is substantially similar to the pending master label amendment for Roundup Weed & Grass Killer Super Concentrate (EPA Reg. No. 71995-25); as well as the recently accepted master label amendment MON 78736 (EPA Reg. No. 71995-37) dated 3/28/2019.

We are of the understanding that this submission falls under the definition of fast track amendment for which no PRIA Service Fee is required. If the Agency evaluates this application differently, please let us know.

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August 20, 2019

Ona Maune

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In addition to reformatting the label, the following summary of revisions were made to this master label:

- 1) Relocated 'Where To Use' section into 'Directions for Use' per previous Agency feedback.
- 2) Moved 'User Safety Recommendations' and 'Entry Restrictions' statements into 'When To Apply' section directly below 'Application Restrictions', which is consistent with recently approved master labels.
- 3) In the Mixing and Use Instructions section, an optional table was added to clearly communicate the two use rates.
- 4) Relocated specific uses listed in the 'Additional Tips' section into the 'How to Apply' section, as done previously on approved master labels. Optimized directions for existing use instructions for consistency.
- 6) Environmental Hazard statement was revised to remove 'Do not contaminate water when cleaning equipment or disposing of equipment washwaters.'; which is not required for homeowner products per the Diquat RED. The following statement is currently listed: "Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems."
- 7) Modified country of origin statement to reflect additional optional language.
- 8) Appendix 1: Consolidated List of Label Claims and Appendix 2: Packaging Related Claims were reformatted, alphabetized and additions/ deletions were made.

Monsanto Company requests that the Agency review and accept these proposed changes to the Master Label for EPA Reg. No. 71995-29.

This submission is being submitted electronically and contains the following items:

- Application for Pesticide (Amendment) – EPA Form 8570-1
- Electronic label, filename: 071995-00029.20190820.pdf

If you have any questions regarding this submission, please contact me directly at (636)737-9577 or via e-mail [ona.maune@bayer.com](mailto:ona.maune@bayer.com) or James Nyangulu at (202)383-2866 or via email [james.nyangulu@bayer.com](mailto:james.nyangulu@bayer.com)

Yours sincerely,

Ona Maune  
Federal Regulatory Affairs Manager  
Bayer US Crop Science  
Monsanto Company Lawn & Garden Products